

CENTERS FOR MEDICARE & MEDICAID SERVICES  
Office of Information Technology  
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Chief Information Officer  
Office of Information  
Technology  
Centers for Medicare & Medicaid Services

# **CMS Operational Policy for Analog Line Request & Usage**

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## **1. PURPOSE**

This document establishes an operational policy for requesting the installation, movement, or removal of an analog line and the usage of analog lines at the Centers for Medicare & Medicaid Services (CMS).

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## **2. BACKGROUND**

Analog telephone lines have the potential of presenting security risks to CMS Information Technology (IT) infrastructure due to the possibility of such lines being used to gain unauthorized access to CMS IT systems, data, and information. For this reason, the number and use of analog lines must be strictly controlled.

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## **3. SCOPE**

This operational policy applies to all IT activities and IT assets owned, leased, controlled, or used by CMS, including those of CMS' agents and contractors that occupy Government space, where IT infrastructure is provided by the Office of Information Technology (OIT). This policy does not apply to the CMS Regional Office or Washington, D.C., locations.

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## **4. POLICY**

### **4.A. Basis for Approval of Requests for an Analog Line**

A request for installation of an analog line shall be approved only if justified by a legitimate business need, and only if approving the request will not pose a security risk. Examples of such business needs include:

- Testing of remote access dial-in (dial-out only)
- Modems used by vendors for maintenance (see Section 4.B below)
- Text Telephone (TTY) / Telecommunications Device for the Deaf (TDD)
- Peripheral equipment (e.g., cordless phones)

### **4.B. Use of Analog Lines Connected to the IT Infrastructure**

When connection to an element of the IT infrastructure is involved, the approved mechanism for dial-out analog capability is the modem pool.

Modems used with dial-in analog lines, which are connected to the IT infrastructure and used for maintenance, shall display approved dial-in banner when dialed into device (see Attachment Section below) be turned off until enabled for use by a specific request. In each

instance, the maintenance activity must be continuously monitored, and once the maintenance action has been completed, the modem must be turned off.

#### **4.C. Recertification of Analog Lines**

Once an analog line has been installed, the requestor shall be required to recertify on an annual basis that the need for the line still exists, and that the line is being used for the purpose indicated on the initial request.

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### **5. ROLES AND RESPONSIBILITIES**

The following entities have responsibilities related to the implementation of this operational policy:

#### **5.A. Requestor**

The individual requesting the installation, movement, or removal of an analog line (a.k.a., Requestor) is responsible for the following activities:

- Requesting an analog line in accordance with the appropriate procedures (see Attachment Section below);
- Annually recertifying the continued need for an analog line; and
- Accepting responsibility that the attached device is connected, if appropriate, to the CMS infrastructure only in a manner approved by the Office of Information Technology (OIT) / Infrastructure and User Services Group (IUSG) / Division of Enterprise Network Communications (DENC).

#### **5.B. Requestor's Group Director**

The Requestor's Group Director is responsible for authorizing an analog line request before it is submitted to the OIT/IUSG for consideration.

#### **5.C. Office of Information Technology (OIT) / Infrastructure and User Services Group (IUSG) / Division of Enterprise Network Communications (DENC)**

The OIT/IUSG/DENC is responsible for the following activities:

- Developing and implementing procedures to ensure compliance with Sections 4.A and 4.C above;
- Approving or disapproving requests for the installation, movement, or removal of analog lines;
- Maintaining a current list of all analog lines and associated information (e.g., requestor (user), use, annual certification date, etc.);
- Recertifying all existing analog lines on an annual basis in accordance with the appropriate procedures;
- Disconnecting analog lines that are no longer in use; and

- Overseeing CMS' IT Infrastructure Implementation Agent or Contractor's execution of their role in fulfilling this policy.

#### **5.D. IT Infrastructure Implementation Agent or Contractor**

CMS' IT Infrastructure Implementation Agent or Contractor is responsible for the following activities:

- Developing and implementing procedures to ensure compliance with Section 4.B above; and
- Installing, moving, or removing analog lines as directed by the OIT/IUSG/DENC.

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### **6. INFORMATION AND ASSISTANCE**

Contact the Director of the Division of Enterprise Network Communications (DENC) of the Infrastructure and User Services Group (IUSG) within the Office of Information Technology (OIT) Technology Management Group (TMG) within the Office of Information Technology (OIT) for further information regarding this operational policy.

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### **7. APPLICABLE LAWS/GUIDANCE**

The following laws and guidance are applicable to this operational policy:

- Recommended Security Controls for Federal Information Systems, NIST Special Publication 800-53

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### **8. EFFECTIVE DATE/APPROVAL**

This policy becomes effective on the date that CMS' Chief Information Officer (CIO) signs it and remains in effect until it is rescinded, modified or superseded by another policy.

This policy must not be implemented in any recognized bargaining unit until the union has been provided notice of the proposed changes and given an opportunity to fully exercise its representational rights.

Signature: \_\_\_\_\_ /s/ \_\_\_\_\_ Date of Issuance: 10/09/18

George Hoffmann  
Deputy Chief Information Officer  
Deputy Director (Policy), Office of Information Technology

## **Policy Owner's Review Certification**

Signature: \_\_\_\_\_ /s/ \_\_\_\_\_ Date of Review: 10/17/18

Mark Oh  
Director, Infrastructure & User Services Group  
Office of Information Technology